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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

UNITED SERVICES AUTOMOBILE
ASSOCIATION,

Plaintiff,

vs.

TALLY HO FARM, LLC, a Utah limited
liability company; and B.H., a minor individual,

Defendants.

**STIPULATION FOR SECOND
AMENDED COMPLAINT FOR
DECLARATORY RELIEF**

Case No. 2:21-cv-00665-BSJ

Judge Bruce S. Jenkins

TALLY HO FARM, LLC, a Utah limited
liability company,

Cross-Claimant,

vs.

B.H., a minor individual,

Cross-Claim Defendant.

TALLY HO FARM, LLC, a Utah limited
liability company

Third-Party Plaintiff,

vs.

DAVID KIM, an individual; and REBECCA
KIM, an individual.

Third-Party Defendants.

Pursuant to F. R. Civ. P. 15(a)(2), the parties hereby provide written consent to United Services Automobile Association (“USAA”) amending the complaint as reflected in **Exhibit A** to this Stipulation. The Second Amended Complaint will be filed separately by USAA. With this stipulation, the Defendants Tally Ho Farm, LLC, and B.H., and the Third-Party Defendants David Kim and Rebecca Kim, make no concessions about the substance of the amendments, and Defendants and Third-Party Defendants will have the opportunity to address the amendments in a responsive pleading.

DATED this 10th day of February, 2023.

GOEBEL ANDERSON PC

/s/ Jennifer H. Mastrorocco
Jennifer H. Mastrorocco
Attorney for Plaintiff

STIPULATED AND AGREED TO:

DATED this 10th day of February, 2023.

/s/ Bruce C. Burt
Bruce C. Burt
Attorneys for Tally Ho Farms, LLC
(Signed electronically with permission)

DATED this 10th day of February, 2023.

/s/ Ryan J. Schriever
Ryan J. Schriever
A. Andrew Penrod
Attorneys for Defendant B.H.
& Third-Party Defendants David Kim and
Rebecca Kim
(Signed electronically with permission)

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of February, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

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/s/ Jennifer H. Mastrorocco